

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) JOSHUA FIELDS	)	
	)	
Plaintiff,	)	
	)	
v.	)	21-cv-00986-G
	)	
(1) GREAT LAKES INSURANCE SE,	)	<i>Removed from the District Court of</i>
(2) MJ KELLY COMPANY, and	)	<i>Kay County, State of</i>
(3) CAPSTONE ISG,	)	<i>Oklahoma, Case No. CJ-2021-00037</i>
	)	
Defendants.	)	

**DEFENDANT GREAT LAKES INSURANCE SE'S FINAL WITNESS LIST**

Defendant Great Lakes Insurance SE (“Defendant,” or Great Lakes”) hereby identifies witnesses who will be called and those who may be called at trial. Defendant will supplement, modify, or augment these submissions as necessary, due to any permissible changes by Plaintiff, additional discovery, and/or as otherwise provided by applicable rules or Court order.

**WITNESS LIST**

<b><u>NO.</u></b>	<b><u>NAME</u></b>	<b><u>SUBJECT OF TESTIMONY</u></b>	<b><u>EXPECTED / MAY BE CALLED</u></b>
1.	Joshua Fields c/o counsel for Plaintiff	To be deposed.	Will be called.
2.	Jessica Fields c/o counsel for Plaintiff	To be deposed.	Will be called.
3.	Kevin Randall Kevin Randall Insurance	Facts and circumstances relating to the issuance of Plaintiff’s Policy with Great Lakes; facts and circumstances related to Plaintiff’s claim submitted as a result of the	Will be called.

		subject fire.	
4.	Representatives of Capstone ISG c/o counsel for Great Lakes	Facts, circumstances, and documents relating to the subjects of this litigation, including, but not limited to, facts alleged in Plaintiff's Petition, Plaintiff's loss claims under the Policy and subsequent claims investigations, claims handling, and determinations related thereto.	May be called.
5.	Ashley Eadie Capstone ISG c/o counsel for Great Lakes	Facts, circumstances, and documents relating to the subjects of this litigation, including, but not limited to, facts alleged in Plaintiff's Petition, Plaintiff's loss claims under the Policy and subsequent claims investigations, claims handling, and determinations related thereto.	Will be called.
6.	Kevin Wilson Capstone ISG c/o counsel for Great Lakes	Facts, circumstances, and documents relating to the subjects of this litigation, including, but not limited to, facts alleged in Plaintiff's Petition, Plaintiff's loss claims under the Policy and subsequent claims investigations, claims handling, and determinations related thereto.	Will be called.
7.	Terry Nichols Capstone ISG c/o counsel for Great Lakes	Facts, circumstances, and documents relating to the subjects of this litigation, including, but not limited to, facts alleged in Plaintiff's Petition, Plaintiff's loss claims under the Policy and subsequent claims investigations, claims handling, and determinations related thereto.	May be called.
8.	Representative(s) of Great Lakes c/o counsel for Great Lakes	Facts, circumstances, and documents relating to the subjects of this litigation, including, but not limited to, facts alleged in Plaintiff's Petition, Plaintiff's loss claims under the Policy and subsequent claims investigations, claims handling, and determinations related thereto.	Will be called.
9.	Georgia Costin Bell & Clements Ltd. c/o counsel for Great Lakes	Facts and circumstances relating to supervisory duties regarding claims investigation and management/handling of Plaintiff's claims under Policy.	May be called.
10.	Jack McNeal Reliable Reports	Facts, circumstances, and regarding property in question, including prior inspections and	Will be called.

	1760 South Stemmons Fwy, Suite 130 Lewisville TX (800) 460-0723	multi-peril property report prepared in 2015.	
11.	Philip Noah, IAAI-CFI Fire Division Manager Rimkus Consulting Group, Inc. c/o counsel for Great Lakes	Facts and opinion testimony relating to the subject fire, the damages resulting therefrom, and regarding investigation of cause of fire and investigation findings.	Will be called.
12.	Cullen Fowler Rimkus Consulting Group, Inc. c/o counsel for Great Lakes	Facts and opinion testimony relating to the subject fire, the damages resulting therefrom, and regarding investigation of cause of fire and investigation findings.	Will be called.
13.	Korey Pruitt Property Inspector City of Ponca City 516 E. Grand Ponca City, OK (580) 767-0383	Facts and circumstances regarding property in question, including, but not limited to, the facts and circumstances relating to the subject fire and the subject property.	Will be called.
14.	Fire Marshal Dereck Cassady Ponca City Fire Department 516 East Grand Ave Ponca City, OK Tel: (580) 767-0361	Facts and circumstances relating to the subject property and the fire, observations during response to fire, suppression services provided, any investigation of the incident and completion of incident reports pertaining to the incident at issue.	Will be called.
15.	Members of the Ponca City Fire Department 516 East Grand Ave Ponca City, OK Tel: (580) 767-0361 Including: Ron Cremers Carson Combest Christopher Jones Tanner Toney Benjamin Webb Nicholas Fulton Scott Garrett Gary Whitehead	Facts and circumstances relating to the subject property and the fire, observations during response to fire, suppression services provided, any investigation of the incident and completion of incident reports pertaining to the incident at issue.	May be called.

	Benjamin Creech Andre Stoll Allan Fogle Lane Leathers Chad Cunningham Cody Regier Ptl. Kisen Sharp Marcus Kincaid Fabron Porter Jeff Woodward Jesus Lara Tucker Hodgson		
16.	Sgt. Brian Dye Ponca City Police Department 200 E. Oklahoma Ponca City, OK Tel: (580) 767-0370	Facts and circumstances relating to the subject property and the fire, observations during response to fire, suppression services provided, any investigation of the incident and completion of incident reports pertaining to the incident at issue; facts and circumstances relating to his investigation of the incident, interactions with other agencies relating to possible arson investigation, and completion of incident reports pertaining to the incident at issue.	Will be called.
17.	Investigator David Van Buskirk McCord Volunteer Fire Department 22 Howard Ponca City, OK Tel: (580) 765-4700	Facts and circumstances relating to the subject property and the fire, observations during response to fire, suppression services provided, any investigation of the incident and completion of incident reports pertaining to the incident at issue.	May be called.
18.	Mr. Keith Alston 1501 E. Walnut Ponca City, OK	Prior tenant at subject property; facts and circumstances about his tenancy in the building, subsequent vacation of the property, interactions with Plaintiff as landlord/landowner, and the condition of the building at or near the time of the fire.	May be called.
19.	Mr. Keith Howard Address Currently Unknown	Facts and circumstances regarding property in question; facts and circumstances relating to the subject fire and related property claim	May be called.

		filed with Great Lakes.	
20.	Keith Crawford Property Manager	Facts and circumstances regarding property in question; facts and circumstances relating to the subject fire and related property claim filed with Great Lakes.	May be called.
21.	John Andrew City Attorney for Ponca City 516 E. Grand Ponca City, OK Tel: (580) 767-0339	City's interactions with Plaintiff as it relates to the preservation and demolition of Plaintiff's property after fire.	May be called.
22.	Blake Langfeldt 118 ½ N. Oak #2 Ponca City, OK (last known address)	Facts and circumstances surrounding the incident at issue in this case; facts and circumstances relating to his observations of the incident and any circumstances leading up to the incident at issue.	May be called.
23.	Justin Burns 118 ½ N. Oak #2 Ponca City, OK (last known address)	Facts and circumstances surrounding the incident at issue in this case; facts and circumstances relating to his observations of the incident and any circumstances leading up to the incident at issue.	May be called.
24.	Amy Dawn Baker 3200 N. 14 <sup>th</sup> Street Ponca City, OK (580) 362-3868	Facts and circumstances surrounding the incident at issue in this case; facts and circumstances relating to her observations of the incident and any circumstances leading up to the incident at issue.	May be called.
25.	All witnesses listed by Plaintiff, except as objected to by Defendant		
26.	All witnesses identified in subsequent discovery or further in the course of litigation		
27.	Any witness necessary for authentication of exhibits, including custodian(s) of records.		
28.	All witnesses necessary for rebuttal.		

Respectfully submitted,

/s/ Sara E. Potts

DOERNER SAUNDERS DANIEL

& ANDERSON, LLP

Sara E. Potts, OBA No. 32104

Emily E. Allan, OBA No. 33456

210 Park Avenue, Suite 1200

Oklahoma City, OK 73102

T: (405) 898-8654 | F: (405) 898-8684

Email: [spotts@dsda.com](mailto:spotts@dsda.com)

[eallan@dsda.com](mailto:eallan@dsda.com)

-and-

Michael Linscott, OBA No. 17266

Two West Second Street, Suite 700

Tulsa, OK 74103-3117

T: (918) 591-5288 | F: (918) 925-5288

Email: [mlinscott@dsda.com](mailto:mlinscott@dsda.com)

*Attorneys for Defendant Great Lakes*

*Insurance SE*

### **CERTIFICATE OF SERVICE**

This certifies that on August 18, 2022, a true and correct copy of the foregoing document was served via the Court's electronic notification system to the following counsel of record:

Scott R. Jackson

Scott R. Jackson

Martin Jean & Jackson

P.O. Box 2403

Ponca City, Oklahoma 74602

[sjackson@mjjlawfirm.com](mailto:sjackson@mjjlawfirm.com)

*Attorneys for Plaintiff*

/s/ Sara E. Potts